

Exhibit A

Declaration of Sarah Larson on behalf of Rock River Arms, Inc.

I, Sarah Larson, hereby declare as follows.

1. I am over the age of 18 years, and I am qualified to submit this declaration on behalf of Rock River Arms, Inc. (“Rock River”).

2. I have personal knowledge of the facts set forth in this declaration through direct involvement and by personally reviewing Rock River’s records and information.

3. I am the General Manager of Rock River. My father-in-law, Lester Charles (“Chuck”) Larson, Jr., co-founded Rock River in 1996. I have served as the General Manager since 2011.

4. Rock River is authorized by law to manufacture and sell firearms as a Federal Firearms Licensee licensed by the Bureau of Alcohol, Tobacco, Firearms and Explosives.

5. All of Rock River’s manufacturing operations take place in Colona, Illinois.

6. Rock River manufactures a number of long guns (rifles), AR-pistols (pistols), and 1911 model (handguns), as well as firearms accessories (uppers and lowers).

7. The overwhelming majority of Rock River’s sales — nearly 99% — are attributable to rifles, specifically rifles built on the AR-15 platform.

8. HB 5471 explicitly bans two of Rock River’s rifle models by name: the Rock River Arms LAR-15 and Rock River Arms LAR-47. But it is not just those two models that are now prohibited. Greater than 95% of the rifles Rock River currently manufactures is an “assault weapon” under HB 5471, as they are semiautomatic, and accept a detachable magazine. All of them have one or more of: a pistol grip; a grip that can be held by the non-trigger hand; a folding, telescoping, thumbhole, or detachable stock; and/or a shroud allowing the bearer to hold the firearm with the non-trigger hand without being burned.

9. HB 5471 explicitly bans one of Rock River's pistol models by name: the Rock River LAR-15 pistol. But the Rock River LAR-15 pistol is not the only Rock River pistol that is now outlawed as an "assault weapon" under HB 5471. These other models outlawed include the LAR-BT9G, LAR-PDS, LAR-9M, and LAR-15M.

10. Rock River sells its products to distributors, retailers, and dealers in Illinois, as well as distributors, retailers, and dealers outside of Illinois. Rock River also sells to law enforcement offices in and out of Illinois, through distributors.

11. Over the past two-plus years (since the beginning of 2021), sales in Illinois have accounted for 10 – 15 % of Rock River's annual revenues. And at least 98% of those Illinois sales are attributable to rifles built on the AR-15 platform, all of which, under HB 5471, are now unlawful to sell to customers in Illinois as "assault weapons."

12. In addition to manufacturing and selling firearms and other products, Rock River also sells magazines capable of holding more than 10 rounds of ammunition for long guns as well as magazines capable of holding more than 15 rounds for pistols. Rock River currently has in its inventory millions of dollars' worth of firearms and magazines that, under the new Illinois law, are now unlawful to sell in Illinois as "large capacity ammunition feeding devices."

13. Absent an injunction, Rock River will suffer millions of dollars of losses that it will not be able to recoup, plus lost customers, and other irreparable harms.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this day of February 3, 2023.

By: _____
Sarah Larson